

NEPA Analysis Process: Affected Environment

M. Conry: Another part of your NEPA analysis is the affected environment. You may ask, what is the affected environment and why is it important?

The affected environment is a concise description of your existing resource conditions and trends, which may be affected by your proposed action or one of your alternatives.

Ultimately, you should be able to crosswalk your affected environment section with your environmental consequences section.

Your affected environment is not intended to be a sweeping description of all of the resources you may manage within your field office. Keep it related to the issues that you are analyzing.

For example, if your proposed action is to reclaim a disturbed site by manually planting native flora, and you've not identified any air quality issues, you wouldn't need to discuss air quality in your affected environment section.

As I think we've said earlier, there's no regulatory requirement to make negative declarations about unaffected resources or critical elements.

Your affected environment section helps the interdisciplinary team and decision makers stay focused on your action or alternatives and how they could impact resources significantly.

This section is critical because it sets the baseline against which any of your impacts, including the cumulative impacts, are measured.

Writing an affected environment section can take a little bit of skill. However, you have lots of great sources of information available to you, such as your RMPs, environmental impact statement, a number of programmatic EISs, a variety of other NEPA documents or assessments, and scientific literature. These previous descriptions of resource descriptions or trends may be incorporated by reference into your analysis. As always, a quantitative description is desirable whenever this could be possible.

Again, remember to keep your affected environment section concise and keep it focused on those resources related to the issues that you plan to analyze.

C. Humphrey: When you talk about incorporated by reference, I've seen a lot of times where people will incorporate in a whole EIS by reference. That's not the right way of doing it. Tell us the *real* way of incorporating by reference.

M. Conry: Good question, Cathy. BLM is great at making the sweeping motherhood statement that we're incorporating this by reference and never mentioning the document or its conclusions again in our entire analysis.

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The right way to incorporate by reference is to cite and summarize. Look at the piece of literature, summarize the conclusions that are useful, provide a reference to the specific portion of the literature that you're using.

Please don't try and incorporate an entire EIS. It makes it very unclear to the reader in terms of what conclusions are you using? What is it about that affected environment that's relevant?